

SEP 28 2017

Miles Julison
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LODGED _____ REC'D _____ *Ljc*
PAID _____ DOCKETED _____

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re: Case No.: 17-32418-dwh 13
Miles Julison,
Debtor.

**VERIFIED RESPONSE TO [24], [25] TRUSTEE'S OBJECTION TO
CONFIRMATION AND MOTION TO DISMISS, AND SUPPLEMENT**

Debtor responds to [24] TRUSTEE'S OBJECTION TO CONFIRMATION AND
MOTION TO DISMISS ("Motion") and [25] SUPPLEMENTAL TRUSTEE'S
OBJECTION TO CONFIRMATION AND MOTION TO DISMISS ("Supplement").

The Motion requests:

1. TFS verification

RESPONSE: Done. See attached.

2. Tax returns

RESPONSE: See attached Declaration.

3. Bank statements

RESPONSE: Already hand-served on Trustee; has mailed copies to Trustee.

4. Profit & Loss statements

RESPONSE: Attached to accompanying letter.

5. Amended Schedule A/B

RESPONSE: Schedule A/B has been amended as per Trustee's request.

6. Amended Schedule C “to use the proper exemption and exemption amounts on the Debtor’s assets”

RESPONSE: Schedule C has been amended as per Trustee’s request.

7. Amended Schedule D to include the mortgage creditors

RESPONSE: This matter is disputed. The existing Schedule D is consistent with Debtor’s allegations in the Adversary Proceeding.

8. Amended Schedule E/F to remove the entry for Nationpoint (mortgage) and include notice to the IRS and ODR

RESPONSE: This matter is disputed. The existing Schedule E/F is consistent with Debtor’s allegations in the Adversary Proceeding. There is no reason to give notice to IRS or ODOR since they have not filed a Proof of Claim. At such time as either party files a Proof of Claim, Debtor will respond appropriately.

9. Amended Schedule I to include the Debtor’s new employment information and spouse’s business income.

RESPONSE: This would be premature, as Debtor has not yet officially been hired. Confirmation should be available Oct 2. The company name is Reliable Mobile Lab, address 1932 McGilcrist Street SE, Salem OR 97302. The Debtor’s non-filing spouse’s income has been included on Schedule I.

10. Amended Schedule J to include the \$100 restitution obligation

RESPONSE: Schedule J has been amended as per Trustee’s request.

11. Amended Statement of Financial Affairs to indicate that that the Debtor is married (#1), prior address (#2), spouse’s income (#4), and no safety deposit box (#21).

RESPONSE:

12. Amended 122C-1 “to complete the form and all necessary information.”

RESPONSE: Form 122C-1 has been amended.

The [25] Supplement requests:

1 through 6 – **RESPONSE:** 1 through 6 have all been amended as requested.

7. Add a Plan provision for Nationpoint (mortgage).

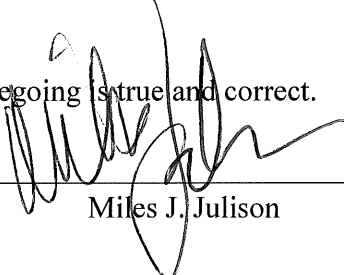
RESPONSE: This matter is disputed. The Plan is consistent with Debtor’s allegations in the Adversary Proceeding.

8: seek the counsel of an attorney

RESPONSE: Still attempting to find an attorney specializing in bankruptcy who is willing to take my case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 28, 2017



Miles J. Julison

CERTIFICATE OF SERVICE

I hereby certify that on the date last written below I served the foregoing document on the following by depositing it in the U. S. Mail, first class postage prepaid addressed, as follows:

US Trustee
620 SW Main St #213
Portland, OR 97205

Chapter 13 Trustee
Wayne Godare
222 SW Columbia St #1700
Portland, OR 97201

US Bank NA
c/o Michael Scott
McCarthy Holthus LLP
920 SW 3rd Ave. 1st Floor
Portland, OR 97204

PYOD, LLC its successors and assigns
as assignee of Citibank (South Dakota), N.A.
Resurgent Capital Services
PO Box 19008
Greenville, SC 29602 (101525871)

Bank of America NA
PO Box 942019
Simi Valley CA 93094-2019

Bank of America, N.A.
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PNC BANK NATIONAL ASSOCIATION
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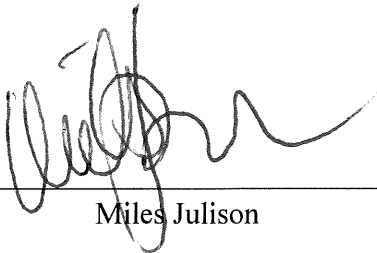
PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

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Shellpoint Mortgage Servicing
75 Beattie Pl Ste 300
Greenville SC 29601

Dated: September 28, 2017



Miles Julison